

Thanks for the opportunity to submit comments to the DGAC. As a registered dietitian, I see first hand how little Americans understand about nutrition, and the subsequent effects. The average American is now overweight. Almost half of all Americans take at least one prescription drug, with figures increasing with age. In fact, nearly 2/3 of Americans 45 and over and 85% of seniors take at least one drug (Health, United States, 2007. CDC, NCHS. Table 96 accessed at cdc.gov). On average, those over age 45 take 4 prescriptions daily. (Prescription Drug Use Among Midlife and Older Americans. January, 2005 The Roper Public Affairs & Media Group accessed at http://assets.aarp.org/rgcenter/health/rx_midlife_plus.pdf)

Because the DGAC can no longer assume the average American is healthy, the Dietary Guidelines must be more aggressive in establishing a standard of appropriate intake. Specifically, the DGAC must take a more aggressive approach in recommending foods that can prevent and/or treat obesity, CVD, stroke, diabetes, renal disease, some types of cancer, osteoporosis, and other conditions associated with poor dietary habits. According to the preponderance of the data, these foods are fruits, vegetables, whole grains, beans, nuts and seeds. In other words, it's time to use the term "plant-based" or "plant-centered" as the key dietary guideline.

This concept does not exclude other foods such as eggs, fish, poultry, and red meat, but refocuses the American diet toward those foods that have the most potential to address today's health issues. Please don't continue the American obsession with animal protein, which reflects an antiquated philosophy remaining from 60 yrs ago, when the first Dietary Guidelines were established. Current prevalence rates of protein/calorie insufficiency, although not zero, are a small fraction of rates which existed 60 years ago.

MEAT & BEANS

Although it's notable that the Meat Group is now the Meat and Beans Group, the name should be changed to the Protein Group. Guidelines should reflect the fact that plant proteins provide nearly all of the nutrients as their animal-based counterparts, but with numerous healthy phytochemicals which not only may be useful in preventing the chronic diseases listed, but cannot be found in any animal protein food. Thus, the first of three bullet points (as shown on the website) stating that Americans should "choose low-fat or lean meats and poultry", the first bullet point should be replaced with "choose more fish, beans, peas, nuts, and seeds". The last bullet point should be "if you eat meat, choose low-fat or lean poultry and occasional red meats". And the Guidelines should specifically include limits on processed meats (hot dogs, bacon, deli, sausage, ham, scrapple) due to ingredients such as saturated fat, excess sodium, preservatives, and smoke flavors that tend to increase risks of cancer and other chronic diseases listed above.

In the Protein Group, change beans serving size to one-half cup and nut serving size to one-quarter cup to increase protein content to 7 g, the same as other foods. The difference in calories as a result of these changes is negligible over time.

MILK

The Milk Group should be renamed the Calcium Group, since almost 1 in 12 Americans choose to not drink cows' milk (VRG 2006 poll, vrg.org). Milk is a biological fluid uniquely suited to meet the needs of a baby calf, which will weigh 300 pounds one year after birth. To sustain that

growth, cows' milk contains at least three dozen bioactive hormones and growth factors (Endocrine Reviews, Dec 1993, v 14(6), p 710). Many of these bioactive compounds originate from the cow's pregnancy while lactating. To suggest that bovine prolactin, growth hormone, TSH, FSH, LH ACTH, and oxytocin are appropriate ingredients in human nutrition defies all logic. In fact, the dairy cow herself does not drink milk. According to pro-milk arguments, she should be osteoporotic and hunched over.

The Calcium Group should be expanded to include calcium-fortified juices, soy and rice beverages, plus collard greens, kale, and figs. Collard greens should be added because they supply more bioavailable calcium (50% of total content) per cup than cows' milk (30% of total content), even though actual calcium content of collard greens is lower than cows milk.

Eliminate cottage cheese as an milk-equivalent, since 2 cups of cottage cheese is an unreasonable amount to consume.

OILS

Inside the Oils Group, the recommendation for vegetable oils needs to be qualified. Soy, corn and most other polyunsaturated (n-6) oils contain components which are essential, but are also likely drivers of inflammatory processes in large amounts. Consumers should be encouraged to focus on monounsaturated fats from olives/olive oil, nuts/nut oils, avocado, and canola.

Reduce optimal % calories from fat to 25%, and then eventually to 20%. WHI and other studies show intake of 30% of calories from fat produces no benefit over higher proportions of fat, while other studies show reducing fat content to well below 30% likely is a factor in disease prevention.

GRAINS

Increase emphasis on whole grains by stating "make most of your grain choices whole"

FOOD LABELS

Food labels should distinguish added sugars from those naturally occurring, such as from fruit or fruit juice.

Since the consumer cannot distinguish nutrients to be limited vs. nutrients to ensure adequacy, food labels should eliminate %DV, as these serve only to confuse, not educate the consumer.

Food labels should eliminate reporting calories from fat, and instead report % calories from fat, since this is the type of fat guideline referenced elsewhere.

Bring back concept of "serving sizes". Use as a standard unit of measurement.

Food labels should be standardized to use and reflect serving sizes in the Dietary Guidelines.

Any single-serving container containing more than 100% of a serving should be rounded up or down to the nearest half serving. Therefore a serving size of liquid beverages should be standardized to 8 ounces, and the nutrition label on a 12 ounce can of soda should report 1.5

servings, not one. A 1.5 ounce potato chip bag should report 1.5 servings, not one. Labels on pasta products should not be allowed to report 42 g of carbohydrates as a serving.

PUBLICITY AND EDUCATION

Better efforts should be made to educate the public. Establishing a pyramid without sufficient educational efforts, particularly efforts designed for low-income, low-literacy, underserved populations, fails to address the needs of the most nutritionally marginal segments of society, which now comprise a large percent of our country's population. This same population also suffers disproportionately from most of the chronic diseases listed.